

Appl. No. 09/766,022
Amtd. Dated October 9, 2003
Reply to Office action of April 9, 2003

Remarks/Arguments

Claims 1-25 are 35 U.S.C. §103(a) rejected on the basis of Smethers (US6463304) in view of Morgenthaler (US6310609).

Regarding claim 1, Examiner states that Smethers possesses the step of reading the markup [sic] language file. The present patent does not have as an element "reading the markup language file". The applicant thanks the patent Examiner for taking his call. Please recall that during our conversation we specifically discussed the citation in Smethers you used as support for the reading of *any* language file, and it was agreed that Smethers simply does not show this. The claim, on the other hand, requires "reading the markup language file". Smethers fails to disclose in column 3, lines 22-35, lines 60-67, col. 5, lines 19-46 and col. 7, lines 3-34 a "reading the markup language file", nor do any of the figures suggest that that is done by the Smether's patent. Smether's does disclose "[a]n image map providing an indication of the relationship between resident applications and the navigation key assignments is displayed...", but this is not the "reading the markup language file" required in the present invention. Examiner makes no assertion that Morganthalier or any other art teaches all elements of the present claim, in particular the reading step. Since neither reference supplies this essential step, claim 1 does not run afoul of 35 U.S.C. §103(a). Claims 2-9 depend from claim 1, and for that same reason as just stated, should be in allowable form as should claim 1.

Regarding claim 10, Examiner states that Smethers possesses the step of reading the markup [sic] language file. The present patent does not have as an element "reading the markup language file". The applicant thanks the patent examiner for taking his call. Please recall that during our conversation we specifically discussed the citation in Smethers you used as support for the reading of *any* language file, and it

Appl. No. 09/766,022
Amdt. Dated October 9, 2003
Reply to Office action of April 9, 2003

was agreed that Smethers simply does not show this. As noted earlier, Smethers does not provide the "reading the markup language file" when Smethers describes: [a]n image map providing an indication of the relationship between resident applications and the navigation key assignments is displayed...", but this is not the "reading the markup language file". Examiner makes no assertion that Morganthaler or any other art teaches all elements of the present claim, in particular the reading step. Since neither reference supplies this essential step, claim 10 does not run afoul of 35 U.S.C. §103(a). Claims 11-16 depend from claim 10, and for that same reason as just stated, should be in allowable form as should claim 10.

Regarding claim 17, Examiner incorrectly states that claim 17 requires "the steps of reading the makup [sic] language file". Claim 17 is an apparatus claim and requires no steps. It is respectfully suggested that the Examiner mischaracterizes claim 17, and fails to show all elements of the claim in Smethers, Morganthaler alone or in combination with other art. For this reason, it is requested, that the rejection be withdrawn. Smethers does not show a means for reading the markup language file. Smethers does not show a means for detecting a reference to a character encoding having a corresponding function. Smethers does not show a means for illuminating at least one character-entry pressure point having a character encoding. Smethers does not show a means for detecting a entry by the character-entry pressure point. Smethers does not show a means for triggering the function. Morganthaler does not show at least one of the above means either. In short, it is believed that claim 17 shows elements not found in either Smethers or Morganthaler, and thus is in a condition for allowance. Since claims 18-25, which are also apparatus claims, do not possess any steps, for equal reason, such claims should be allowable.

On the basis of the above amendments and remarks, it is respectfully submitted that the claims are in condition for allowance. Accordingly, reconsideration of this application and allowance of pending claims 1-25 is requested.

Respectfully submitted,
NOKIA INC.

By:

Robert C. Rolnik
Robert C. Rolnik
Reg. No. 37,995
Tel: (972) 894-5931

Attachments

RECEIVED
CENTRAL FAX CENTER
OCT 10 2003

OFFICIAL